

**BRODY D. SMITH**  
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August 8, 2011

**VIA FIRST CLASS MAIL**

Frank C. Brock  
Geologist  
U.S. Environmental Protection Agency Region 2  
Ground Water Compliance Section  
290 Broadway, 20th Floor  
New York, NY 10007

Re: *US Salt, LLC: Class III UIC Permit Renewal Application*

Dear Frank:

We represent US Salt, LLC with regard to its application to renew a class III UIC permit for ten (10) existing solution mining wells at its plant on Salt Point Road in Watkins Glen, New York. We previously shared drafts of the enclosed application materials with you by email and appreciate your comments. I also understand that you may need us to send a copy of these documents to another person at EPA because it is a class III rather than class II permit. If that is the case please let me know who to send it to and I will prepare another package.

I look forward to speaking with you soon about what additional materials, if any, are required to complete the application.

Sincerely,

BOND, SCHOENECK & KING, PLLC



Brody D. Smith

 <b>United States Environmental Protection Agency</b> <b>Underground Injection Control</b> <b>Permit Application</b> <small>(Collected under the authority of the Safe Drinking Water Act. Sections 1421, 1422, 40 CFR 144)</small>		EPA ID Number: NY0005300																																												
		T/A	C																																											
<b>Read Attached Instructions Before Starting</b> <b>For Official Use Only</b>																																														
Application approved <small>mo day year</small>	Date received <small>mo day year</small>	Permit Number	Well ID																																											
II. Owner Name and Address		III. Operator Name and Address																																												
Owner Name US Salt, LLC		Owner Name US Salt, LLC																																												
Street Address P.O. Box 110, Salt Point Road		Street Address P.O. Box 110, Salt Point Road																																												
Phone Number (607) 321-8084		Phone Number (607) 321-8084																																												
City Watkins Glen	State NY	ZIP CODE 14891	City Watkins Glen																																											
State NY	ZIP CODE 14891	City Watkins Glen	State NY																																											
IV. Commercial Facility		V. Ownership																																												
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Other																																												
		<input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator																																												
		2899 - Salt																																												
VII. Well Status (Mark X)																																														
<input checked="" type="checkbox"/> A Operating		<input type="checkbox"/> B. Modification/Conversion <input type="checkbox"/> C. Proposed																																												
Date Started <small>mo day year</small> 01/01/1908																																														
IX. Type of Permit Reported (Mark X and specify as required)																																														
<input type="checkbox"/> A. Individual <input checked="" type="checkbox"/> B. Area		Number of Existing Wells 10																																												
		Number of Proposed Wells 0																																												
		Name(s) of field(s) or project(s) Watkins Glen Plant																																												
X. Class and type of Well (see cover)																																														
A. Class(es) (enter code(s))	B. Type(s) (enter code(s))	C. If class is "other" or type is code 'x,' explain	D. Number of wells per type (if area permit)																																											
III	G		10 wells: class III-g																																											
XI. Location of Well(s) or Approximate Center of Field or Project			XII. Wetland (Mark X)																																											
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="3">Latitude</th> <th colspan="3">Longitude</th> <th colspan="4">Township and Range</th> <th colspan="2"></th> <th colspan="2"></th> <th rowspan="2"> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No         </th> </tr> <tr> <th>Deg</th> <th>Min</th> <th>Sec</th> <th>Deg</th> <th>Min</th> <th>Sec</th> <th>Sec</th> <th>Twp</th> <th>Range</th> <th>1/4 Sec</th> <th>Feet From</th> <th>Line</th> <th>Feet From</th> <th>Line</th> </tr> <tr> <td>42</td> <td>24</td> <td>36.1</td> <td>76</td> <td>53</td> <td>50.8</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>			Latitude			Longitude			Township and Range								<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Deg	Min	Sec	Deg	Min	Sec	Sec	Twp	Range	1/4 Sec	Feet From	Line	Feet From	Line	42	24	36.1	76	53	50.8									
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XIII. Attachments																																														
(Complete the following questions on a separate sheet(s) and number accordingly; see Instructions) For Classes I, II, III, (and other classes) complete and submit on a separate sheet(s) Attachments A-U (pp 2-6) as appropriate. Attach maps where required. List attachments by letter which are applicable and are included with your application.																																														
XIV. Certification																																														
I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)																																														
A. Name and Title (Type or Print)		B. Phone No. (Area Code and No.)																																												
Frank Pastore, Plant Manager		607-535-2721																																												
C. Signature		D. Date Signed																																												
		6/17/11																																												

# Exhibit A

Well Name	API Number	Latitude NAD83	Longitude NAD83	Current Well Status	Well Completion Date/ Fluid Inj. Initiated Date	Tubing Depth	Tubing Size	Grade	Weight	Casing Seat	Drilled TD of Well	Injection Zone	Depth of Injection	Top of Cavern	Top of Salt	Bottom of Salt	Elevation around Level
Well 47	31-097-61203-00-01	42.410025	76.895982	Active/ solutioning	6-25-1972/1972	2905'	8 5/8"	K-55	32#	2805'	2929'	Syracuse Salt	2805'	2785'	2124'		781'
Well 48	31-097-61204-00-00	42.411207	76.897455	Active/ solutioning	7-1-1972/1972	2930'	8 5/8"	K-55	32#	2427'	2930'	Syracuse Salt	2427'	2317'	2140'		797'
Well 50	31-097061206-00-00	42.410133	76.894172	Active/ solutioning	7-1-1972/1972	2298'	8 5/8"	K-55	32#	2298'	2905'	Syracuse Salt	2298'	2194'	2060'		727'
Well 51	31-097-61207-00-00	42.4104476	76.892801	Active/ solutioning	9-1972/1972	2286'	5 1/2"			2421'	2815'	Syracuse Salt	2286'	2108'	1993'		663'
Well 55	31-097-12548-00-01	42.41022	76.89725	Active/ solutioning	9-6-1976/1976	2883'	8 5/8"	J-55	36#	2883'	2925'	Syracuse Salt	2883/2638'	2320'	2162'		806'
Well 56	31-097-12859-00-00	42.4099889	76.8984211	Active/ solutioning	11-13-1977/1977	2475'	8 5/8"			2494'	2954'	Syracuse Salt	2494'	2402'	2168'		828'
Well 60	31-097-23033-00-00	42.4204636	76.89977	Active/ solutioning	6-22-2003/2003	4179' H	4 1/2"			7" 2496'	4184' H	Syracuse Salt	2850'TVD	2489'	2103'	2860'	798'
Well 61	31-097-23969-00-00	42.4248137	76.9002872	Active/ solutioning	11-20-2008/2008	2200'	7"			2200'	2796'	Syracuse Salt	2200'	2120'	2114'		790'
Well 62	31-097-23969-00-00	42.423546	76.90018	Active/ solutioning	11-20-2008/2008	2767'	7"			2767'		Syracuse Salt	2767'	2752'	2123'		793'
Well 58	31-097-21467-00-01	42.416054	76.899519	Active/ solutioning	11-27-1992/ 1993	2420'	5 1/2"	J-55	15.5#	2183'	2642'	Syracuse Salt	2420'	2150'	2150'	2913'	814'